Date: 1/2/07

IN WITNESS WHEREOF, the undersigned have caused this Settlement

Agreement to be executed as of the dates set forth below:

FOR THE FREY DEFENDANTS:	FOR THE RANDOM HOUSE DEFENDANTS
Date: 1/2/07	Robert Sorrentino Senior Vice President, Taxes, Random House, Inc
James Frey Big Jim Industries, Inc. Date: 1/2/07	Robert Sorrentino President, Doubleday & Company, Inc. Date:
Maya Frey	Robert Sorrentino Vice President, Taxes, Random House VG, Inc.
Date: 1/2/07	Date:
Derek J. Meyer McDermott Will & Emery LLP 227 West Monroe Street, Suite 4400 Chicago, Illinois 60606 Attorney for the Frey Defendants	Mark B. Blocker Sidley Austin LLP One South Dearborn Chicago, Illinois 60603 Attorney for the Random House Defendants

Date:____

Agreement to be executed as of the dates set forth below:

FOR THE FREY DEFENDANTS:	FOR THE RANDOM HOUSE DEFENDANTS.
	Walte
James Frey	Robert Sorregion Senior Vice President, Taxes, Random House, Inc.
Date:	Date: 12/15/06
James Frey	Robert Sorrentino
Big Jim Industries, Inc.	President, Doubleday & Company, Inc.
Date:	Date: 12/15/06
Maya Frey	Robert Sorrentino Vice President, Taxes, Random House VG, Inc.
Date:	Mark B Blocker
Dook I Manager	Mark B Blocker
Derek J. Meyer McDermott Will & Emery LLP	Mark B. Blocker Sidley Austin LLP
227 West Monroe Street, Suite 4400	One South Dearborn
Chicago, Illinois 60606	Chicago, Illinois 60603
Attorney for the Frey Defendants	Attorney for the Random House Defendants
Date:	Date: 12 /28/2006

FOR	THE	PI A	INT	FFC
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Plaintiff Marolo Vedral	Michele Snow
Carry D. Brian Larry D. Drury Lad. Larry D. Drury Lad. 205 W. Randolph Street. Suite 1430 Chicago. Illinois 60606 Proposed Co-Loud Class Counsel Attorney for Plaintiff Marcia Vedral	Evan J. Smith, Esquire Brodsky & Smith, LLC Two Bala Plana, Suite 602 Bala Cynwyd, PA 19004 (610) 667-6200 Proposed Co- Load Class Comsel Attorney for Plaintiff Michele Snow
Date: 12-6-06	Date: 12-6-06
Plaintiff Jennifer Color Date:	Plaintill Ann Marie Strack Date:
Thomas Mulisney 708 Third Avenue, Suite 2500 New York, New York 10017 Phone: (212) 223-0800 Liuison Class Counsel Attorneys for Plaintiff Jennifer Cohn	Thomas A. Ziminerman, Jr. Ziminerman and Associates, P.C. 100 West Monroe Street, Suite 1300 Chreago, Illinois 60603 Attorney or Plaintiff Ann Marie Street
Date:	Date:

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FOR THE PLAINTIFFS:

Plaintiff Marcia Vedral	Plaintiff Michele Snow
Date:	Date:
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Larry D. Drury	Evan J. Smith, Esquire
Larry D. Drury Ltd.	Brodsky & Smith, LLC
205 W. Randolph Street, Suite 1430	Two Bala Plaza, Suite 602
Chicago, Illinois 60606	Bala Cynwyd, PA 19004
Proposed Co-Lead Class Counsel	(610) 667-6200
Attorney for Plaintiff Marcia Vedral	Proposed Co- Lead Class Counsel
	Attorney for Plaintiff Michele Snow
Date:	Date:
Plaintiff Diane Marolda	Plaintiff Ann Marie Strack
Date: 12/7/00	Date:
12 Comments	
Thomas Mullaney	Thomas A. Zimmerman, Jr.
708 Third Avenue, Suite 2500	Zimmerman and Associates, P.C.
New York, New York 10017	100 West Monroe Street, Suite 1300
Phone: (212) 223-0800	Chicago, Illinois 60603
Liaison Class Counsel Attorneys for Plaintiff Diane Marolda	Attorney or Plaintiff Ann Marie Strack
Date: 12.5.3/2V.	Dotar

FOR THE PLAINTIFFS:

Plaintiff Marcia Vedral	Plaintiff Michele Snow
Date:	Date:
Larry D. Drury Larry D. Drury Ltd. 205 W. Randolph Street, Suite 1430 Chicago, Illinois 60606 Proposed Co-Lead Class Counsel Attorney for Plaintiff Marcia Vedral	Evan J. Smith, Esquire Brodsky & Smith, LLC Two Bala Plaza, Suite 602 Bala Cynwyd, PA 19004 (610) 667-6200 Proposed Co- Lead Class Counsel
Date:	Attorney for Plaintiff Michele Snow
Plaintiff Jennifer Cohn	Plaintiff Ann Marie Strack Date: 12-8-06
Thomas Mullaney 708 Third Avenue, Suite 2500 New York, New York 10017 Phone: (212) 223-0800 Liaison Class Counsel Attorneys for Plaintiff Jennifer Cohn	Thomas A. Zimmerman, Jr. Zimmerman and Associates, P.C. 100 West Monroe Street, Suite 1300 Chicago, Illinois 60603 Attorney or Plaintiff Ann Marie Strack
Date:	Date: 12-11-2006

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Plaint It Jiminy Gloyd	Plaintiff Jill Giles
1/4/07 A	Date:
Mas S. Nidhe	9
Alan S. Ripka	Alan J. Statman
Napoli Bern Ripka LLP	Colleen M. Hegge (of counsel)
115 Broadway	2900 Chemed Center
New York, New York 10006	255 East Fifth Street
Attorney for Plaintiff Jimmy Floyd	Cincinnati. Ohio 45202
	Attorneys for Plaintiff Jill Giles
Date: December 5, 2006	Date:
Plaintiff Pilar More	Plaintiff Shera Paglinawan
Date:	Date:
Thomas E. Pakenas	Michael David Myers
Dale and Pakenas	Myers & Company, P.L.L.C. 1809 Seventh Avenue, Suite 700
641 W. Lake Street, Suite 400	Scattle, Washington 98101
Chicago, Illinois 60661 Attorneys for Plaintiff Pilar More	Attorney for Plaintiff Shera Paglinawan
Date:	Date:
Plaintiff Sara Brackenrich	
Date:	
Vincent L. DiTommaso	
DiTommaso & Lubin, PC 17W 220 22nd Street, Suite 200	
Oakbrook Terrance, Illinois 61081	
Attorney for Plaintiff Sara Brackenrich	
Date:	

Date:____

Plaintiff Jimmy Floyd	Plaintiff Jill Giles
Date:	Date:
Alan S. Ripka	Alan J. Starman
Napoli Bern Ripks LLP	Colleen M. Hegge (of counsel)
115 Broadway	2900 Chemed Center
New York, New York 10006	255 East Fifth Street
Attorney for Plaintiff Jimmy Floyd	Cincinnati, Ohio 45202
**************************************	Auorneys for Plaintiff Jill Giles
Date:	Date:
Plaintiff Pilar More	Plaintiff Shera Paglinawan
Date:	Date:
Thomas E. Pakenas	Plaintiff Wendy Shaw
Dale and Pakenas	
641 W. Lake Street, Suite 400 Chicago, Illinois 60661	Date:
Attorneys for Plaintiff Pilar More	
Date:	Wahad Paul Ma
Date:	Michael David Myers
	Myers & Company, P.L.L.C. 1809 Seventh Avenue, Suite 700
	Seattle, Washington 98101 Attorney for Plaintiff Shera Paglinawan
	Date:
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Plaint Sara Brackenrich	Manager .
Date: 20 Nov. 06	
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	- Vill Giles / by be attom fly C. A.
Plaintiff Jimmy Floyd	Flaintiff Jill Giles
Date:	Date: 12-7-0 6
Alan S. Ripka Napoli Bein Ripka LLP 115 Broadway New York, New York 10006 Attorney for Plaintiff Jimmy Floyd	Alan J Statman Colleen M. Hegge (of counsel) 2900 Chemed Center 255 East Fifth Street Cincinnati, Ohio 45202 Attorneys for Plaintiff Jill Giles
Date:	Date: 12-7-04
Plaintiff Pilar More	Plaintiff Shera Paglinawan
Date:	Date:
Thomas E. Pakenas Dale and Pakenas 641 W. Lake Street, Suite 400 Chicago, Illinois 60661 Anorneys for Plaintiff Pilar More Date:	Michael David Myers Myers & Company, P.L.L.C 1809 Seventh Avenue, Suite 700 Seattle, Washington 98101 Attorney for Plaintiff Shera Paglinawan Date:
Plaintiff Sara Brackenrich Date:	
Vincent L. DiTommaso DiTommaso & Lubin, PC 17W 220 22nd Street, Suite 200 Oakbrook Terrance, Illinois 61081 Attorney for Plaintiff Sar a Brackenrich Date:	•

Plaintiff Jimmy Floyd	
	Plaintiff Jill Giles
Date:	- Cites
	Date:
Alan S. Ripka	-
Napoli Bern Rinks I I D	Alan J. Statman
113 Broadway	Colleen M. Hegge (of counsel)
New York, New York 1000	2900 Chemed Center
Attorney for Plaintiff Jimmy Floyd	255 East Fifth Street
a cinally Pioya	Cincinnati, Ohio 45202
	Attorneys for Plaintiff Sill Giles
Date:	Jul Giles
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Plaintiff Pilar More	Xhua Do
	Plaintiff Shera Pagunawan
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	Date: 3 Dec. 3000
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Thomas E. Pakenas	
Dale and Pakenas	Plaintiff Wendy Shaw
641 W. Lake Street Suize 400	Singw
CITICARO, Illinois KAKKI	Date:
Attorneys for Plaintiff Pilar More	-
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The state of the s	Michael David Myers
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	Myers & Company, PLL.C.
	1809 Seventh Avenue, Suite 700
	Souther Washington Dates
	Attorney for Plaintiff Shera Paglinawan
	Date: 12 . 3 . 2006
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aintiff Sara Brackenrich	
ate:	
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ncent L. DiTommaso	
Tommaso & Lubin, PC	

Plaintiff Jimmy Floyd	Plaintiff Jill Giles
Date:	Date:
Alan S. Ripka	Alan J. Statmon
Napoli Bern Ripka LLP 115 Broadway	Collecn M. Hegge (of counsel)
New York, New York 10006	2900 Chemed Center
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y y - range vising 1 toya	Cincinnati, Ohio 45202 Attorneys for Plaintiff Jill Giles
Date:	Date:
Plaintiff Pilar More	Plaintiff Shera Paglinawan
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Date:	Date:
Thomas E. Pakenas	Plaintiff Wondy Shaw
Dale and Pakenas	The state of the s
641 W. Lake Street, Suite 400	Date: 2/04
Chicago, Illinois 60661 Attorneys for Plaintiff Pilar More	
Date:	Michael David Myers
0	Myers & Company, P.L.L.C.
	1809 Seventh Avenue, Suite 700
	Scattle, Washington 98101 Autorney for Platniff Shera Paglinawan
	Date:
Plaintiff Sara Brackenrich	-
Date:	
Vincent L. DiTommaso	·
DiTommaso & Lubin, PC	